

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

AMERICAN SOCIETY FOR THE  
PREVENTION OF CRUELTY TO  
ANIMALS, et al.,

Plaintiffs,

v.

Case No. 03-2006 (EGS/JMF)

RINGLING BROS. AND BARNUM &  
BAILEY CIRCUS, et al.,

Defendants.

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MOTION TO COMPEL DOCUMENTS SUBPOENAED FROM THE  
WILDLIFE ADVOCACY PROJECT AND MEMORANDUM OF POINTS  
AND AUTHORITIES IN SUPPORT THEREOF

EXHIBIT 44

**PRIVILEGE LOG (Updated 6-29-06)  
WILDLIFE ADVOCACY PROJECT**

Doc Type/Number	Date	Author/Originator	Recipient(s)	Description	Basis for Withholding
Custom Transaction Detail Report; Page #s 139-140	Current as of 9/30/05	Wildlife Advocacy Project	n/a	Reflects all relevant receipts of funding by W/AP regarding Ringling Bros., elephants, and/or Tom Rider	Partial redaction: identities of non-plaintiff individual contributors withheld on First Amendment grounds.
Letter to contributor; Page # 141	1/5/04	Eric Glitzenstein	WAP contributor	Thank you letter for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter from contributor; Page # 142	12/30/03	Non-plaintiff contributor	WAP	Letter of support for work of Tom Rider	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter from contributor; Page # 143	1/31/04	Non-plaintiff contributor	WAP	Letter of support for work of Tom Rider and WAP	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.

Letter to contributor; Page # 144	3/15/04	Eric Glitzenstein	Non-plaintiff contributor	Thank you letter for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter to contributor; Page # 146	2/17/04	Eric Glitzenstein	Non-plaintiff contributor	Thank you letter for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter from contributor; Page # 147	1/31/04	Non-plaintiff contributor	WAP	Letter of support for Tom Rider and WAP	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter to contributor; Page # 148	1/2/04	Eric Glitzenstein	Non-plaintiff contributor	Thank you letter for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.

Letter from contributor; Page # 149	3/2/04	Non-plaintiff contributor	WAP	Letter of support for Tom Rider	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter to contributor; Page # 150	5/6/04	Eric Glitzenstein	Non-plaintiff contributor	Thank you for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter from contributor; Page # 151	4/30/04	Non-plaintiff contributor	WAP	Letter of support for Tom Rider	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter to contributor; Page # 152	6/7/04	Eric Glitzenstein	Non-plaintiff contributor	Thank you for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.

Letter from non-plaintiff contributor; Page # 153	undated	Non-plaintiff contributor	WAP	Letter of support for Tom Rider	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter to contributor; Page # 154	7/9/04	Eric Glitzenstein	Non-plaintiff contributor	Thank you for contribution	Partial redaction: identity and address of non-plaintiff contributor withheld on First Amendment grounds.
Letter from contributor; Page # 155	6/29/04	Non-plaintiff contributor	WAP	Letter of support for Tom Rider	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter from contributor; Page # 156	9/1/04	Non-plaintiff contributor	WAP	Letter of support for Tom Rider	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.

Letter from contributor; Page # 157	3/1/04	Non-plaintiff contributor	W/AP	Letter of support for Tom Rider	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter from contributor; Page # 158	8/1/04	Non-plaintiff contributor	W/AP	Letter of support for Tom Rider	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter from contributor; Page # 159	9/30/04	Non-plaintiff contributor	W/AP	Letter of support for Tom Rider	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter to contributor; Page # 160	11/8/04	Eric Glitzenstein	Non-plaintiff contributor	Thank you for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.

Letter from contributor; Page # 161-62	11/26/04	Non-plaintiff contributor	WAP	Letter of support for Tom Rider	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter to contributor; Page # 163	1/19/05	Eric Glitzenstein	Non-plaintiff contributor	Thank you for contribution	Partial redaction: identity and address of non-plaintiff contributor withheld on First Amendment grounds.
Letter from contributor; Page # 164	undated	Non-plaintiff contributor	WAP	Letter of support for Tom Rider	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter from contributor; Page # 165-66	10/30/04	Non-plaintiff contributor	WAP	Letter of support for Tom Rider	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.

Letter to contributor; Page # 167	2/7/05	Eric Glitzenstein	Non-plaintiff contributor	Thank you for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter from contributor; Page # 168	1/27/05	Non-plaintiff contributor	WAP	Happy new year greeting and letter of support for Tom Rider	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter to contributor; Page # 169	3/9/05	Eric Glitzenstein	Non-plaintiff contributor	Thank you for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter from contributor; Page # 170	2/28/05	Non-plaintiff contributor	WAP	Thank you for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.



Letter to contributor; Page # 171	4/7/05	Eric Glitzenstein	Non-plaintiff contributor	Thank you for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter from contributor; Page # 172	3/29/05	Non-plaintiff contributor	WAP	Letter of support for Tom Rider	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter to contributor; Page # 173	5/6/05	Eric Glitzenstein and Katherine Meyer	Non-plaintiff contributor	Thank you for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter from contributor; Page # 174	4/29/05	Non-plaintiff contributor	WAP	Letter of support for Tom Rider	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.

Letter to contributor; Page # 175	6/15/05	Eric Glitzenstein	Non-plaintiff contributor	Thank you for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter from contributor; Page # 176	5/28/05	Non-plaintiff contributor	WAP	Letter of support for Tom Rider	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter to contributor; Page # 177	7/12/05	Eric Glitzenstein	Non-plaintiff contributor	Thank you for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter from contributor; Page # 178-179	7/20/05	Non-plaintiff contributor	WAP	Letter of support for Tom Rider	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.

Letter to contributor; Page # 180	9/12/05	Eric Glitzenstein	Non-plaintiff contributor	Thank you for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter from contributor; Page # 181	8/28/05	Non-plaintiff contributor	W/AP	Letter of support for Tom Rider and work of W/AP	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter to contributor; Page # 182	8/16/05	Eric Glitzenstein	Non-plaintiff contributor	Thank you for contribution	Partial redaction: identity and address of non-plaintiff contributor withheld on First Amendment grounds.
Letter from contributor; Page # 183	8/1/05	Non-plaintiff contributor	W/AP	Letter of support for Tom Rider and expressing hope that "compassion will prevail"	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.

Letter to contributor; Page # 184	6/3/05	Eric Glitzenstein	Non-plaintiff contributor	Thank you for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter to contributor; Page # 192	12/11/03	Katherine Meyer	Non-plaintiff contributor	Thank you for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter to contributor; Page # 193	4/19/04	Eric Glitzenstein	Non-plaintiff contributor	Thank you for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter to contributor; Page #s 194-196	11/3/03	Katherine Meyer	Non-plaintiff contributor	Thank you for contribution and description of Tom Rider media activities	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.

Letter to contributor; Page #s 197-198	4/19/05	Katherine Meyer	Non-plaintiff contributor	Thank you for contribution and description of Tom Rider activities	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter to contributor; Page # 199	10/7/04	Katherine Meyer	Non-plaintiff contributor	Thank you for contribution and description of Tom Rider activities	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter to contributor; Page # 200	6/7/04	Eric Glitzenstein	Non-plaintiff contributor	Thank you for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter to contributor; Page # 201	8/3/04	Eric Glitzenstein	Non-plaintiff contributor	Thank you for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.

Letter from supporter; Page # 202	11/24/03	Non-plaintiff supporter	Katherine Meyer	Letter of support for Tom Rider	Partial redaction: identity and address of non-plaintiff supporter withheld on First Amendment grounds.
Letter from supporter; Page # 203	11/23/04	Non-plaintiff supporter and contributor	Katherine Meyer	Letter of support for Tom Rider	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter from supporter; Page # 204	11/24/04	Non-plaintiff supporter	Katherine Meyer	Letter of support for Tom Rider	Partial redaction: identities and address of non-plaintiff individual supporters withheld on First Amendment grounds.
Letter from supporter; Page # 205	11/24/05	Non-plaintiff supporter	Katherine Meyer	Letter of support for Tom Rider	Partial redaction: identity and address of non-plaintiff individual supporter withheld on First Amendment grounds.

Letter to contributor; Page # 206	11/26/05	Eric Glitzenstein	Non-plaintiff contributor	Thank you for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter to contributor; Page # 207	12/9/03	Eric Glitzenstein	Non-plaintiff contributor	Thank you for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter from supporter; Page # 208-209	11/20/03	Non-plaintiff supporter	Katherine Meyer	Note identifying individuals who said they would contribute to Tom Rider's media work	Partial redaction: identities of individual supporters withheld on First Amendment grounds.
Letter to contributor; Page # 210	11/26/03	Eric Glitzenstein	Non-plaintiff supporter	Thank you for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.

Letter to contributor; Page # 211	11/26/03	Eric Glitzenstein	Non-plaintiff supporter	Thank you for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter from contributors; Page # 212	11/20/03	Non-plaintiff contributor	Katherine Meyer	Letter supporting efforts of Tom Rider	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter to contributors; Page # 213	11/26/03	Eric Glitzenstein	Non-plaintiff contributor	Thank you for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter to contributor; Page # 214	12/9/03	Eric Glitzenstein	Non-plaintiff contributor	Thank you for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.



Letter to contributor; Page # 215	12/9/03	Eric Glitzenstein	Non-plaintiff contributor	Thank you for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter to contributor; Page # 216	12/9/03	Eric Glitzenstein	Non-plaintiff contributor	Thank you for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter to contributor; Page # 217	12/9/03	Eric Glitzenstein	Non-plaintiff contributor	Thank you for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.
Letter to contributor, Page # 218	12/16/03	Eric Glitzenstein	Non-plaintiff contributor	Thank you for contribution	Partial redaction: identity and address of non-plaintiff individual contributor withheld on First Amendment grounds.

Letter to contributor; Page # 219	12/16/03	Eric Glitzenstein	Non-plaintiff contributor	Thank you for contribution	Partial redaction: identity and address of non-plaintiff contributor withheld on First Amendment grounds.
Memo with handwritten notes; Page # 220-221	3/13/01	Tom Rider	Katherine Meyer	Bus schedule and handwritten notes	Partial redaction: (1) identities of grassroots activists with whom WAP associates and works withheld on First Amendment grounds; (2) identities of WAP media contacts withheld on First Amendment grounds.
Memo to file regarding Tom Rider media; Page #s 222-225	2001	unknown	unknown	Description of articles, other media regarding elephants, Ringling Bros.	Partial redaction: (1) identities of grassroots activists with whom WAP associates and works withheld on First Amendment grounds; (2) identities of WAP media contacts withheld on First Amendment grounds.

Handwritten notes; Page # 228	5/16/05	Katherine Meyer	n/a	advocacy effort	Partial redaction: identity of grassroots activist with whom WAP associates and works withheld on First Amendment grounds.
Handwritten notes, Page # 229	undated	Katherine Meyer	n/a	media effort	Partial redaction: identity of WAP media contact withheld on First Amendment grounds.
Handwritten notes; Page # 230	6/2/05	Katherine Meyer	n/a	advocacy and media effort	Partial redaction: identity of WAP media contact withheld on First Amendment grounds.
Electronic mail; Page # 231	11/5/03	Non-plaintiff supporter	Katherine Meyer	E-mail supporting efforts of Tom Rider	Partial redaction: grassroots activists with whom WAP associates and works withheld on First Amendment grounds.

E-mails; Page # 234	4/7/05, 4/8/05	Eric Glitzenstein and WAP Funder	n/a	Confirmation that WAP may use funds to support elephant education efforts, and thank you note	Partial redaction: (1) identifying information concerning former WAP associate withheld on First Amendment grounds; (2) suggested resource for Tom Rider's media efforts withheld on First Amendment grounds.
E-mail and handwritten notes; Page # 237	11/12/03	Katherine Meyer	Bessie Smith	Press interview with Tom Rider and notes on other topics	Partial redaction: (1) identity of WAP media contact withheld on First Amendment grounds; (2) identity of grassroots activist with whom WAP associates and works withheld on First Amendment grounds.

Grant Proposal; Page #s 238-259	12/11/03	Katherine Meyer	Cathy Liss, Animal Welfare Institute	Request for funding for Public Education Effort	Partial redaction: identities and addresses of grassroots supporters of WAP withheld on First Amendment grounds.
Memo to File; Page #s 267-269	undated	n/a	n/a	Memo to file describing Tom Rider's and WAP's strategy for garnering media and public interest in Ringling Bros. treatment of elephants	Partial redaction: identity of WAP media contacts and internal media strategy withheld on First Amendment grounds.
Handwritten Note; Page # 271	5/05	Tom Rider	Katherine Meyer	Tom Rider's notes on strategy for contacting media, with additional note by Katherine Meyer	Partial redaction: identity of WAP media contacts and internal media strategy withheld on First Amendment grounds.
Cancelled checks; Page # 408	10/2/03 & 10/30/03	Wildlife Advocacy Project	Tom Rider	Funding for public education and media efforts	Partial redaction: identity and address of non-plaintiff individual supporters withheld on First Amendment grounds.

Cancelled checks; Page # 414	10/14/03, 11/13/03 & 11/19/03	Wildlife Advocacy Project	Tom Rider	Funding for public education and media efforts	Partial redaction: identity and address of non-plaintiff individual supporters withheld on First Amendment grounds.
Cancelled Checks; Page # 416	8/22/03, 9/4/03 & 9/22/03	Wildlife Advocacy Project	Tom Rider	Funding for public education and media efforts	Partial redaction: identity and address of non-plaintiff individual supporters withheld on First Amendment grounds.
Cancelled checks; Page # 418	7/23/03 & 8/13/03	Wildlife Advocacy Project	Tom Rider	Funding for public education and media efforts	Partial redaction: identity and address of non-plaintiff individual supporters withheld on First Amendment grounds.
Check Stub; Page # 464	4/11/05	Wildlife Advocacy Project	n/a	Funding to purchase vehicle for public education and media efforts	Partial redaction: identity of non- plaintiff contributor withheld on First Amendment grounds.

Checks from contributors; Page # 503	12/7/03, 12/5/03 & 12/10/03	Non-plaintiff contributors	Wildlife Advocacy Project	Contributions to WAP related to Tom Rider/elephant project	Partial redaction: identity and address of non-plaintiff individual contributors withheld on First Amendment grounds.
Checks from contributors; Page #s 512-537	2003 - 2005	Non-plaintiff contributors	Wildlife Advocacy Project	Contributions to WAP related to Tom Rider/elephant project	Partial redaction: identity and address of non-plaintiff individual contributors withheld on First Amendment grounds.